

REQUIRED STATEMENT
TO ACCOMPANY MOTIONS FOR RELIEF FROM STAY

Debtor Megan L. Leonard Case No 19-16133 Chapter 13
Moving Creditor Nationstar Mortgage LLC d/b/a Mr. Date Case Filed June 05, 2019
Cooper

Nature of Relief Sought: Lift Stay Annul Stay Other (describe): _____

Chapter 13 Date of Confirmation Hearing August 26, 2019 Date Plan Confirmed

1. Collateral

- a. Home
- b. Car _____
- c. Other (describe) _____

2. Balance Owed as of August 19, 2019 \$207,223.47

Total of all other Liens against Collateral \$1,752.00 (per debtor's schedule)

3. In chapter 13 cases, if a post-petition default is asserted in the motion, attach a payment history listing the amounts and dates of all payments received from the Debtor post-petition.

4. Estimated Value of Collateral (must be supplied in *all* cases) \$170,000.00 (per Debtor's Schedules)

5. Default

- a. Pre-Petition Default
Number of months _____ Amount \$ _____
- b. Post-Petition Default
 - i. On direct payments to the moving creditor
Number of months 2 Amount \$2,620.34 (including attorney's fees and costs)
 - ii. On payments to the Standing Chapter 13 Trustee
Number of months _____ Amount \$ _____

6. Other Allegations

- a. Lack of Adequate Protection § 362(d)(1)
 - i. No insurance
 - ii. Taxes unpaid Amount \$ _____
 - iii. Rapidly depreciating asset
 - iv. Other (describe) Material payment default
- b. No Equity and not Necessary for an Effective Reorganization § 362(d)(2)
- c. Other "Cause" § 362(d)(1)
 - i. Bad Faith (describe) _____
 - ii. Multiple Filings
 - iii. Other (describe) _____
- d. Debtor's Statement of Intention regarding the Collateral
 - i. Reaffirm
 - ii. Redeem
 - iii. Surrender
 - iv. No Statement of Intention Filed

Date: August 27, 2019

Submitted By:

/s/Toni Townsend

ARDC# 6289370

McCalla Raymer Leibert Pierce, LLC